

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CIVIL ACTION NO. 04-10493 GAO

MANUEL ROSA
Plaintiff,

v.

CITY OF BOSTON,
Defendant.

LOCAL RULE 16.1 JOINT STATEMENT OF THE PARTIES

Pursuant to the Court's Notice of Scheduling Conference and Rule 16.1(D) of the Local Rules of the United States District Court for the District of Massachusetts, counsel for the above named parties have conferred and propose the following pretrial schedule:

1. Proposed Discovery and Motion Schedule:
 - (a) Automatic disclosures to be completed on or before November 30, 2004.
 - (b) The parties will serve written discovery requests by February 28, 2005.
 - (c) Depositions of the parties and fact witness will be completed by June 30, 2005.
 - (d) Plaintiff will disclose his expert(s) and produce the Rule 26(a)(2)(b) report by July 29, 2004. Defendants will disclose their expert(s) and produce the Rule 26(a)(2)(b) report by August 31, 2005.
 - (e) Fact discovery will be completed by September 30, 2005.
 - (f) The parties will serve motions for summary judgment no later than October 31, 2005.
2. The parties have not yet agreed to a trial by a magistrate judge.

Respectfully submitted,

DEFENDANT, CITY OF BOSTON,
Merita A. Hopkins
Corporation Counsel
By its attorney,

PLAINTIFF, MANUEL ROSA,

By his attorney,

/s/ Amy E. Ambarik
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